

**UNITED STATES DISTRICT COURT FOR THE
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

KATE HOFFOWER, on behalf of herself)	
and all others similarly situated,)	
)	
Plaintiff,)	
)	
v.)	Case No. 1:22-cv-2079
)	
SEAMLESS CONTACTS, INC.,)	Honorable Matthew F. Kennelly
)	
Defendant.)	
)	
_____)	

**DECLARATION OF DANIELLE DEMMING IN SUPPORT OF AGREED MOTION TO
SEAL CONFIDENTIAL INFORMATION IN DEFENDANT’S
NOTIFICATION OF AFFILIATES**

DECLARATION OF DANIELLE DEMMING

I, Danielle Demming, pursuant to 28 U.S.C. § 1746, hereby declare as follows:

1. I am the Chief Operating Officer and co-founder of Defendant Seamless Contacts, Inc. (“Seamless”).

2. Pursuant to Local Rules 5.8 and 26.2, I submit this Declaration in support of Defendant’s Motion to Seal Confidential Information in Defendant’s Notification of Affiliates.

3. Seamless is a privately owned company, a significant portion of which was purchased about sixteen months ago by another private company, specifically, a private equity firm, the name of which has been provisionally redacted in Seamless’s publicly filed Notification of Affiliates.

4. Neither Seamless nor the private equity investor have publicly disclosed the transaction since then.

5. Both Seamless and its investor have taken deliberate measures to maintain the confidentiality of its investor.

6. For example, Seamless took swift action against an online post from a former employee concerning the investment, successfully removing it within about five hours.

7. Seamless subsequently filed a complaint and obtained a default judgment against that employee for breaching non-disclosure obligations.

8. Seamless takes that unauthorized disclosure seriously and seeks to prevent additional disclosures because Seamless's investor's notoriety in Seamless's industry, along with its other known partnerships and portfolio companies, means that the disclosure of its identity and interest in Seamless would give critical insights to Seamless's competitors concerning Seamless's future strategies and direction, including but not limited to Seamless's go-to-market strategy, its fundraising efforts, and its strategy relating to potential future mergers and acquisitions.

I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge.

Dated this 27th day of June, 2022.

DocuSigned by:
Danielle Demming
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Danielle Demming